

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA —	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
	:	VIOLATIONS: 18 U.S.C. § 1343
MARTIAL NGUEPI	:	(wire fraud - 2
STEVE MBAKOP	:	counts)
	:	18 U.S.C. § 2 (aiding
	:	and abetting)

INDICTMENT

COUNTS ONE AND TWO

THE GRAND JURY CHARGES THAT:

1. From on or about July 26, 2005 to on or about August 24, 2005, defendants

**MARTIAL NGUEPI,
and STEVE MBAKOP**

devised and intended to devise a scheme to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

2. Defendants MARTIAL NGUEPI, and STEVE MBAKOP falsely represented that they would sell counterfeit U.S. currency in exchange for genuine U.S. currency on a two-for-one basis, when in fact, the defendants had no intention of counterfeiting United States currency.

3. In order to deceive individuals into believing that they had the ability to make

counterfeit U.S. currency, defendants MARTIAL NGUEPI and STEVE MBAKOP created a bogus counterfeiting process in which defendants placed two white sheets of paper in foil (approximately, 6" x 2 ½" in size), and compressed them together with an authentic piece of U.S. currency, and applied powder, a chemical, iodine, and water. Defendants falsely claimed to their victims that the ink from the U.S. currency would "bleed" onto the white sheets that were already inscribed with the markings similar to a true bill of U.S. currency. Defendants presented so called "converted" bills as proof that their counterfeiting process worked, when in fact, through sleight of hand, they simply provided genuine U.S. currency.

4. Defendants MARTIAL NGUEPI and STEVE MBAKOP told an undercover agent that to enable the defendants to manufacture \$80,000 U.S. currency, the undercover agent would have to give the defendants \$40,000 in cash. The defendants falsely represented that the \$40,000 was necessary because the process could only be applied once on an authentic bill, and in order to keep producing the counterfeit bills, the undercover agent should deposit the counterfeit cash into his bank, and thereafter withdraw the deposited amount so the process could be repeated on the withdrawn funds. The defendants further falsely represented that once the money was deposited, that this would be the first in a series of transactions between the undercover agent and the defendants.

5. On or about August 24, 2005, defendants MARTIAL NGUEPI and STEVE MBAKOP accepted \$3,000 in cash from the undercover agent as partial payment for the \$40,000 that the undercover agent agreed to pay the defendants for the purchase of \$80,000 in counterfeit U.S. currency.

THE WIRES

6. On or about each of the dates and times set forth below, in the Eastern District of Pennsylvania and elsewhere, defendants

**MARTIAL NGUEPI
and STEVE MBAKOP,**

for the purpose of executing the scheme described above and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count of this indictment:

<u>COUNT</u>	<u>DATE & TIME</u>	<u>DESCRIPTION</u>
1	08/23/03 4:15 p.m.	A telephone call from defendants in Philadelphia PA, at telephone number 404-200-1869, to undercover agent in the state of Delaware.
2	08/23/03 11:00 p.m.	A telephone call from undercover agent in the state of Delaware, to defendants in Philadelphia, PA, at telephone number 404-200-1869.

All in violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney